



AIRTEL AFRICA PLC
MODERN SLAVERY POLICY STATEMENT
FINANCIAL YEAR ENDED 31 MARCH 2023

This statement relates to the financial year ended 31 March 2023, describing Airtel Africa's approach to assessing and addressing the risk of modern slavery in connection with our business and supply chains.

It is published by Airtel Africa plc and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.

1. ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN

Airtel Africa plc is a public limited company listed on the London Stock Exchange (LSE) and on the Nigerian Stock Exchange (NGX) and is a constituent of the FTSE 100 index.

The Company, together with its direct and indirect subsidiary undertakings (the “**Group**”) has operations in Africa, where it is a leading provider of telecommunication and mobile money services. The Group has a presence in 14 countries in Africa, primarily in East Africa and Central and West Africa with a footprint of approximately 79% of the population across sub-Saharan Africa.¹

As of 31 March 2023, the Group was either the first or second largest operator by number of subscribers in 13 of the 14 markets of presence in Africa and served an aggregate of 140 million total customers.²

The Group's business comprises three elements: mobile voice, mobile data and mobile money (Airtel Money). Within the Group, the mobile voice business comprises pre-paid and post-paid wireless services, international roaming services and fixed-line telephone services. The mobile data business offers 2G, 3G and 4G data services. Both the mobile voice and mobile data services are delivered by a number of direct and indirect subsidiaries (including other telecommunication companies).³

As part of the mobile money business, the Group (in partnership with local financial institutions) provides mobile commerce services that enable customers, among other services, to send and receive money, make payments for utility bills and deposit money through linked bank accounts (in certain countries).

The Group leases and owns extensive tower infrastructure and fibre cables across its territories and continues to develop, maintain and operate its equipment on leased towers. In addition, the Group includes a subsidiary submarine cable company through which the Group has access to submarine cables in the Republic of Congo and Tanzania to support the provision of international voice and data services.

Airtel Africa works with approximately 2,800 vendors. In terms of significance, the top 100 vendors contribute approximately 88% of the total value of procurements.

¹ Page 2, Airtel Africa plc Annual Report and Accounts 2023

² Pages 1 & 10, Airtel Africa plc Annual Report and Accounts 2023

³ Pages 2 & 4, Airtel Africa plc Prospectus dated June 2019



2. POLICIES ADDRESSING SLAVERY AND HUMAN TRAFFICKING

The Company is a signatory to the United Nations Global Compact (UNGC) and is wholly committed to meeting its fundamental responsibilities in the four key areas: human rights, labour, environment and anti-corruption. Our CEO reaffirms our continued support to the Ten Principles of UNGC annually.

Additionally, our sustainability strategy, published in October 2021, is aligned with six of the United Nations Sustainable Development Goals (UN SDGs) and supported by goals and active policies to respect human rights, drive positive social impacts, protect the natural environment and conserve resources.

Ethical behaviour is vital in the Group's operations and conducting business responsibly with regard to their customers and partners is fundamentally important to all Group companies. Our 'AIR' values – Alive, Inclusive and Respectful – describe how we intend to get there. We champion diversity. The Group also works to anticipate, adapt and deliver solutions that enrich the lives of the communities we serve.

The Company's Code of Conduct underpins everything we do. Our modern slavery policy statement is contained within the Code of Conduct and states that the Company conducts its business in a way which respects human rights. The Company denounces holding another person in slavery, child labour, forced labour, inhuman treatment or working conditions that are a threat to life or hinders physical, emotional and mental wellbeing of a person.

The Code of Conduct has been adopted by all companies within Airtel Africa plc, such that it applies to all the Group's workforce (whether permanent or temporary, as well as Board members). All employees and directors within the Group should, therefore, make the Code of Conduct an integral part of their day-to-day duties.⁴

The Code of Conduct contains ethical practices expected from employees, including policy provisions regarding modern slavery. On an annual basis, all Group employees complete mandatory training on the Code of Conduct and for the financial year 2022/23, we recorded a completion rate of 100%, whereby all of Airtel Africa employees have completed the Code of Conduct training and certification exercise, which covers our commitments on diversity, inclusion and anti-discrimination. The Code of Conduct requires all of us to act ethically and to always comply with legal requirements, putting our principles into practice in everything we do. Everyone who works for Airtel Africa is required to report suspected breaches of the Code of Conduct, including via the Airtel Africa anonymous and confidential whistleblowing/hotline reporting service – online and phone reporting hotline in a local language, which is prominently communicated to our workforce and contractors on a regular basis. Every report submitted is assessed and investigated. Further details of our whistleblowing hotline are set out in our Annual Report and on our website.

As outlined in the Code of Conduct, we demand the same high standards from our business partners and evaluate whether a prospective partner's values align with our own before making contractor and supplier decisions. We have a zero-tolerance approach towards modern slavery, human trafficking, forced labour and child labour.

3. DUE DILIGENCE AND RISK ASSESSMENT

Due to the nature of our business, we consider that the business of the Company carries a low risk of modern slavery occurring in our supply chain. We continue to monitor our supply chain with particular focus on the largest 100 suppliers and any new suppliers who may operate in or be exposed to locations, industries or activities with a history of poor labour standards.

⁴ Generally extracted from the Code of Conduct



During the reporting period ended 31 March 2023, we started integrating human rights due diligence into our supplier assessment, outlined in the Airtel Africa plc Annual Report and Accounts 2023.⁵ As part of our sustainability ambition, we launched an ESG due diligence assessment of 100 top vendors, which account for over 88% of overall procurement activities. This was carried out in the form of an online self-assessment questionnaire that the suppliers were required to complete and included an evaluation of their respective policies and protocols explicitly prohibiting any form of child labour, human trafficking, forced labour and modern slavery. Additionally, each year we require that vendors certify to us their compliance with our Code of Conduct in which they undertake that they have not and do not engage in any form of modern slavery, including child labour or forced labour in our supply chain.

During the registration process of new suppliers, the Group conducts screening for new partners against databases for sanctions, anti-bribery and corruption, politically exposed persons and adverse media reports, including reports of possible modern slavery violations. The Group has contracted the services of a third-party provider for the screening database ensuring the information is constantly being updated.

If the effectiveness of our measures is called into question, or our periodic reviews of our compliance indicate any areas for improvement, we will make such changes to our policies, practices and procedures as may be required from time to time.

Our new sustainability framework and detailed plans were outlined in our inaugural Sustainability Report published in October 2022, and the progress made towards our sustainability ambitions features in this year's Annual Report. Our supply chain was identified in the materiality assessment as one of the key material sustainability topics, and thus long-term goals and programmes were developed to address the priority material topics as part of the strategy.

As part of this process, we will review the Code of Conduct certifications, ensure partners follow our standards, review and change, as necessary, the supplier on-boarding processes, and review and amend contractual terms.

Further, we will conduct a further assessment of the Group's potential exposure across our operating business and our supply chain. That analysis will be informed by:

- the risk profile of individual countries based on the Global Slavery Index (GSI)
- the extent to which specific demographic groups or types of employees or contractors
- may be more vulnerable than others for cultural, economic or operational reasons
- the disclosures of peer companies and vendors, and
- the insights of labour and human rights groups and other stakeholders with specialist expertise in this area.

This analysis will, in turn, determine the required programmes and associated compliance mechanisms.

4. EVALUATING OUR PROGRESS

During 2022/23:

- In 2022 we conducted an ESG self-assessment survey amongst 100 of our top suppliers by spend and received a 79% completion rate. Several of the survey questions focused on human rights protection. The results revealed that 90% of respondents had a written policy

⁵ Pages 42 & 43, Airtel Africa plc Annual Report and Accounts 2023



or statement in place that explicitly prohibited child labour, human trafficking, forced labour and modern slavery.

- Our internal audit and assurance team assesses compliance with all internal policies and regulatory obligations and is carried out in partnership with the audit department of Ernst & Young's internal audit services. During the 12 months ended 31 March 2023, the internal audit and assurance team conducted 28 onsite audits.
- Additionally, we are a member of the Joint Audit Cooperation (JAC), which represents telecommunications service providers with shared vendors to the ICT industry. JAC oversees onsite audits of five of our suppliers annually to assess ESG standards of the suppliers and monitor compliance with ESG best practice.
- During the reporting period, we received 180 reports to our external whistleblowing hotline, none of which concerned violations of human rights. The majority of reports received were human resource issues which indicated no compliance concerns or serious breaches of our Code of Conduct. Furthermore, 92% of the reported cases were closed quickly. None of the incidents reported were related to modern slavery issues or violations of human rights. We investigated 34 incidents, five of which were reported to the Executive Committee. The very small number of reports that contained allegations of a breach of our Code of Conduct were thoroughly investigated and disciplinary action was taken, where appropriate.

5. TRAINING AND CAPACITY BUILDING

The annual all-employee mandatory compliance training programme for the Code of Conduct includes modules on modern slavery risks and 'red flags'. A 100% of Airtel Africa's workforce has completed the annual Code of Conduct training (or new joiner induction training) during the 12 months ended 31 March 2023. We plan to enhance these modules to ensure teams are aware of the different types of human rights abuses and to help identify higher risk suppliers for Airtel Africa, industry sector risks, key warning signs, 'red flags' and supplier onboarding protocols. We will target senior purchasing employees to raise awareness of the issues and provide information to assist them in identifying the warning signs of slavery and human trafficking and instructions on how to escalate concerns.

Training is also provided via face to-face line manager events, webinars and induction programmes for new employees.

6. REPORTING CONCERNS

We continue to encourage our workforce to remain vigilant to potential modern slavery and human trafficking abuses and to escalate any concerns they may have with respect to these issues. Employees can report their concerns to management or through the independent whistleblowing helpline, where reports are reviewed and investigated independently. We will continue to seek improvements in our knowledge and remain vigilant to potential areas of heightened risk and investigate concerns raised. Where issues are highlighted through business channels, these are required to be escalated to senior management for review and resolution. As with all incident reporting, individuals who raise concerns on modern slavery in good faith will never be the target of retaliation.



7. NEXT STEPS

As part of our sustainability strategy, we are undertaking a review of our standard supplier contracting terms, with the updates fully implemented by 2025. The changes will enable the Company to respond appropriately, should modern slavery concerns be identified in the supply chain.

8. UK ENTITIES

This statement and the actions taken apply to Airtel Africa plc and its subsidiaries, the specific UK entities that meet the reporting threshold are noted below:

- Airtel Africa plc
- Airtel Africa Services (UK) Limited

BOARD APPROVAL

This statement was approved by the Board of directors of **Airtel Africa plc** on 26 July 2023.

Signed on behalf of the Board of directors of **Airtel Africa plc** by Olusegun Ogunsanya, chief executive officer, on 26 July 2023.

Olusegun Ogunsanya

Chief executive officer and Board director

26 July 2023